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October 4, 2022

Melinda Driscoll, Esq.
Fred Law Firm, PLLC
214 N. 24th St.
PO Box 2157
Billings, MT 59103-2157

RE: ***Nathaniel Lake v. CoreCivic, Worden McTighe & Todd Horn***
Cause No. CV-21-116-GF-BMM (D. Mont.)

Dear Mindi:

Defendants' First Combined Discovery Requests were sent to you on July 1, 2022, in which medical records and damages information was requested. Responses were provided on August 3, 2022, however, were insufficient or incomplete. You acknowledged that the responses were incomplete in stating that additional information, particularly medical records had been requested and would be forthcoming. Unfortunately, to date we have not received any additional information. Additionally, as previously stated to you, the information and documentation provided is insufficient for CoreCivic to formulate positions as to any possible medical and damages experts. Additionally, there was no information provided to Defendants regarding providers or medical personnel who treated or observed your client. Without waiver of any objections due to timeliness, can you please provide the medical records and damages documents so that CoreCivic can prepare its defense and have it reviewed by an expert witness? At a minimum, if you still do not have these records available, CoreCivic requests that you provide executed releases so that it can obtain these records. In the discovery responses Plaintiff provided on August 3, 2022, numerous responses indicate that additional medical records and damages-type documents will be supplemented and forthcoming, yet we have not received any supplementation. Additionally, the discovery responses indicate that executed releases are "en route," (RFP No. 3) however, we have not received any executed releases or documents obtained from such releases.

Defendants also sent a Second Set of Combined Discovery Requests to you on August 9, 2022. The deadline to respond to that discovery was September 12, 2022. To date, Defendants have not received any responses to this second set of discovery. Without waiver of any defenses

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Exhibit G

Melinda Driscoll

RE: Nathaniel Lake v. CoreCivic, Worden McTighe & Todd Horn

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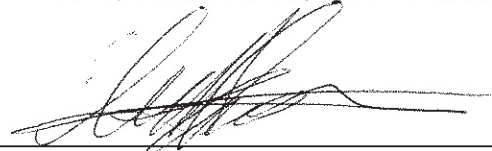
related to late responses, Defendants request that you provide full and complete discovery responses to the second set of discovery so that experts and witnesses can review them, depositions can be taken, etc. to stay on target with the current scheduling order.

Please consider this letter as a good faith attempt to meet and confer regarding the discovery issues above. Please have your client supplement and provide discovery responses immediately. If we do not receive supplemental responses and the responses to CoreCivic's second discovery requests, we will be forced to file a motion to compel or seek other appropriate relief from the court. Thank you for your prompt attention to this matter.

Sincerely,

BROWNING, KALECZYC, BERRY & HOVEN, P.C.

By



Chad E. Adams
Hallee C. Frandsen